

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiff

V.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.

Defendants

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) Civil Action No. 04-11935-DPW
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AFFIDAVIT OF DAVID S. SCHUMACHER

I, David S. Schumacher, being duly sworn, depose and state the following:

1. I am an attorney with the law firm Goodwin Procter LLP, Exchange Place, Boston, Massachusetts, 02109, and a member in good standing of the bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.
2. Goodwin Procter is counsel to Plaintiff Sheila Porter ("Mrs. Porter") in the above-captioned proceeding. I submit this Affidavit in support of Mrs. Porter's Motion to Compel Deposition Preparation Materials From Suffolk County Sheriff's Department ("SCSD").
3. Attached hereto as Exhibit 1 is a true and accurate copy of portions of the deposition of Steven Tompkins, dated June 28, 2005.
4. Attached hereto as Exhibit 2 is a true and accurate copy of a Letter from David S.

Schumacher to Ellen M. Caulo, dated August 4, 2005.

5. Attached hereto as Exhibit 3 is a true and accurate copy of a Letter from Ellen M. Caulo to David S. Schumacher, dated August 4, 2005

6. Attached hereto as Exhibit 4 is a true and accurate copy of a Letter from David S. Schumacher to Ellen M. Caulo dated August 8, 2005

7. Attached hereto as Exhibit 5 is a true and accurate copy of a Letter from David S. Schumacher to Ellen M. Caulo, dated August 22, 2005

8. Attached hereto as Exhibit 6 is a true and accurate copy of a Letter from David S. Schumacher to Ellen M. Caulo, dated August 25, 2005

9. Attached hereto as Exhibit 7 is a true and accurate copy of Mr. Tompkins' Errata Sheet for his deposition, dated August 24, 2005.

10. Attached hereto as Exhibit 8 is a true and accurate copy of a letter from Ellen M. Caulo to David S. Schumacher, dated August 26, 2005

11. Attached hereto as Exhibit 9 is a true and accurate copy of a Press Statement issued by the SCSD, dated August 25, 2004.

12. Attached hereto as Exhibit 10 is a true and accurate copy of McCardle, E., "The New Enforcers," *Boston Globe Magazine*, October 31, 2004, p. 32.

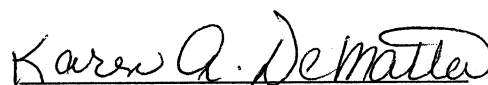
13. Attached hereto as Exhibit 11 is a true and accurate copy of Estes, A., "Nurse Fired From Jail Job Speaks Out," *Boston Globe*, August 25, 2004, p. B2.

14. Attached hereto as Exhibit 12 is a true and accurate copy of portions of the deposition of Elizabeth Keeley, dated May 11, 2005.

Signed under the penalties of perjury this 2nd day of November, 2005.


David S. Schumacher

Subscribed and sworn to before me, a notary public, this 2nd day of November, 2005.


Notary Public
My Commission Expires: 8/4/06

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